

Ray Lego & Associates
7450 Arroyo Crossing Parkway, Suite 250
Las Vegas, Nevada 89113
Telephone No. (702) 479-4350
Facsimile No. (702) 270-4602

1 **SAO**
2 KEVIN P. KING, ESQ.
3 Nevada Bar No. 7405
4 RAY LEGO & ASSOCIATES
5 7450 Arroyo Crossing Parkway, Suite 250
6 Las Vegas, NV 89113
7 P: 702/479-4350
8 F: 702/270-4602
9 kking13@travelers.com

10 Attorney for Defendants,
11 **MATTHEW BERBERICH** and
12 **J.D. STEEL CO., INC.**

13 **UNITED STATES DISTRICT COURT**

14 **DISTRICT OF NEVADA**

15 SHANE BROWN, individually; DEVI
16 BROWN, individually,
17
18 Plaintiffs,

19 vs.

20 MATTHEW BERBERICH, individually; J.D.
21 STEEL CO., INC., a Foreign Corporation;
22 DOES1-20 and ROE BUSINESS ENTITIES
23 1-20, inclusive,
24
25 Defendants.

Case No. 2:24-cv-02179-CDS-CJA

**STIPULATION AND ORDER TO
CONTINUE DISCOVERY DATES AND
DEADLINES (*First Request*)**

**STIPULATION AND ORDER TO CONTINUE DISCOVERY
DATES AND DEADLINES (FIRST REQUEST)**

21 Plaintiffs, SHANE BROWN and DEVI BROWN, appearing by and through their
22 attorney of record, DAVID MENOCAL, ESQ., of MENOCAL LAW GROUP, and Defendants,
23 MATTHEW BERBERICH and J.D. STEEL COMPANY, INC., appearing by and through their
24 attorney of record, KEVIN P. KING, ESQ., of RAY LEGO & ASSOCIATES, and submit the
25 following agreements and stipulations for this Honorable Court's consideration as follows:.

Discovery Completed:

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27
28 1. The parties have exchanged initial documents and witness lists;

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2. The parties have exchanged and responded to written discovery, including Interrogatories and Requests for Production of Documents and Things.

3. Plaintiffs have taken the deposition of Matthew Berberich.

4. Defendants have taken the depositions of Shane Brown and Devi Brown.

Discovery that Remains to be Completed:

1. depositions of remaining parties;
2. depositions of treating providers;
3. depositions of experts; and
4. Additional discovery as needed.

Reasons that Discovery has not yet been Completed:

The parties would like an opportunity to explore the possibility of informal resolution through settlement discussions before having to incur the significant costs associated with the remaining discovery to be completed.

Current Schedule for Completing Discovery:

Motion to Amend or Add Parties Deadline: April 3, 2025

Initial Expert Disclosure: May 5, 2025

Rebuttal Expert Disclosure: June 2, 2025

Close of Discovery: July 22, 2025

Dispositive Motion Deadline: August 1, 2025¹

Pre-Trial Order: September 1, 2025²

¹ If the close of discovery is extended, the dispositive motion deadline shall be extended so it will not be later than thirty (30) days after any subsequent close of discovery date.

² If dispositive motions have been filed, the date for filing the Joint Pre-Trial Order shall be suspended until thirty (30) days after entry of an Order deciding such motions, or until further Order of the Court. If the close of

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Proposed Schedule for Completing Discovery:

Motion to Amend or Add Parties Deadline: April 3, 2025

Initial Expert Disclosure: May 5, 2025

Rebuttal Expert Disclosure: June 2, 2025

Close of Discovery: September 22, 2025

Dispositive Motion Deadline: October 22, 2025³

Pre-Trial Order: November 24, 2025⁴

Current Trial Date:

The trial in this matter has not yet been scheduled.

IT IS SO STIPULATED.

Dated this 26th day of June, 2025

Dated this 26th day of June, 2025

RAY LEGO & ASSOCIATES

MENOCAL LAW GROUP

By: /s/ Kevin King
KEVIN KING, ESQ.
Nevada Bar No. 7405
7450 Arroyo Crossing Parkway
Suite 250
Las Vegas, Nevada 89113
Attorney for Defendants

By: /s/ David Menocal
DAVID MENOCAL, ESQ.
Nevada Bar No. 13191
1980 Festival Plaza Drive
Suite 300
Las Vegas, Nevada 89135
Attorney for Plaintiffs

discovery date is extended, the date for filing the Joint Pre-Trial Order shall be extended in accordance with the time periods set forth in this paragraph.

³ If the close of discovery is extended, the dispositive motion deadline shall be extended so it will not be later than thirty (30) days after any subsequent close of discovery date.

⁴ If dispositive motions have been filed, the date for filing the Joint Pre-Trial Order shall be suspended until thirty (30) days after entry of an Order deciding such motions, or until further Order of the Court. If the close of discovery date is extended, the date for filing the Joint Pre-Trial Order shall be extended in accordance with the time periods set forth in this paragraph.

1 Respectfully submitted,
2 RAY LEGO & ASSOCIATES

3 */s/ Kevin King*

4 _____
5 KEVIN P. KING, ESQ.
6 Nevada Bar No. 7405
7 7450 Arroyo Crossing Parkway
8 Suite 250
9 Las Vegas, NV 89113

10 Attorney for Defendants,
11 **MATTHEW BERBERICH** and
12 **J. D. STEEL CO., INC.**

13 **IT IS SO ORDERED** that the parties' stipulation to continue discovery dates and
14 deadlines (ECF No. 19) is GRANTED.

15 DATED: 6/30/2025

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17 _____
18 DANIEL J. ALBREGTS
19 UNITED STATES MAGISTRATE JUDGE
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